

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

RENEE ZINSKY,

Plaintiff,

V.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS III,
ARIAS AGENCIES, S.A. HOLDINGS, LLC
and AMERICAN INCOME LIFE
INSURANCE COMPANY,

Defendants

2:22-CV-547

Judge Marilyn J. Horan

PETITION TO ENFORCE SETTLEMENT

FILED ON BEHALF OF:

Defendants

Michael Russin, Russin Financial,
and Russin Group

Matthew D. Gailey, Esquire
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400 Holiday Drive,
Suite 210
Pittsburgh, PA 15220

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

RENEE ZINSKY,)	2:22-CV-547
)	
Plaintiff,)	
)	
v.)	
)	
)	Judge Marilyn J. Horan
MICHAEL RUSSIN, RUSSIN FINANCIAL,)	
RUSSIN GROUP, SIMON ARIAS III,)	
ARIAS AGENCIES, S.A. HOLDINGS, LLC)	
and AMERICAN INCOME LIFE)	
INSURANCE COMPANY,)	
Defendants		

PETITION TO ENFORCE SETTLEMENT

AND NOW, comes the Defendants, Michael Russin, Russin Financial, and Russin Group, hereinafter “Russin Defendants”, by and through their attorneys, Cozza Law Group, and files the following Petition to Enforce Settlement averring as follows:

1. This matter stems from a federal lawsuit filed in the Western District of Pennsylvania Against the Russin Defendants et al.

2. The claims of Plaintiff Renee Zinsky, hereinafter “Plaintiff” against Defendant Arias and Defendant American Income Life Insurance Company were transferred to arbitration for the American Arbitration Association.

3. Plaintiff and Russin Defendants entered into a settlement agreement whereby in exchange for the testimony of Michael Russin at an Arbitration hearing, Plaintiff would dismiss the lawsuit in its entirety within 30 days of the conclusion of the Arbitration Hearing against Defendant American Income Life Insurance Company and Defendant Arias. (Russin Defendants can provide a copy of the settlement agreement upon order of the Hon. Judge Horan.)

4. As this Court is aware, the final order of the arbitrators was dated March 4, 2024, as it

was adopted and confirmed by this Court on April 3, 2024.

5. More than thirty (30) days have passed since the arbitration in this matter and Plaintiff has not yet dismissed the lawsuit in its entirety against the Russin Defendants.

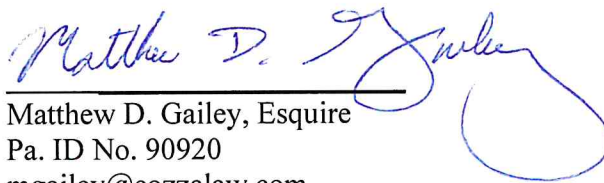
6. Based on the preceding, Russin Defendants requests that this Honorable Court enforce the settlement agreement and dismiss the lawsuit against the Russin Defendants with prejudice.

WHEREFORE, the Russin Defendants request that this Honorable Court dismiss the lawsuit against the Russin Defendants with prejudice along with attorney fees, costs, and any other relief that this Honorable Court deems appropriate.

Dated: April 16, 2023

Respectfully submitted,

COZZA LAW GROUP, PLLC



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*Counsel for Defendants Michael Russin, Russin Financial, and
Russin Group*

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
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RENEE ZINSKY,)	2:22-CV-547
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)	
Defendants		

ORDER OF COURT

AND NOW, it is hereby ORDERED, ADJUDGED, and DECREED, that the Petition to Enforce Settlement is GRANTED. Furthermore, the lawsuit at 2:22-cv-547 filed by Plaintiff against Defendants Michael Russin, Russin Financial, and the Russin Group LLC, is hereby dismissed with prejudice.

Date: _____

J.